Derek W. Loeser (admitted *pro hac vice*)

KELLER ROHRBACK L.L.P. 1201 Third Avenue, Suite 3200

Seattle, WA 98101 Tel.: (206) 623-1900 Fax: (206) 623-3384

dloeser@kellerrohrback.com

Lesley E. Weaver (SBN 191305) BLEICHMAR FONTI & AULD LLP

555 12th Street, Suite 1600

Oakland, CA 94607 Tel.: (415) 445-4003 Fax: (415) 445-4020 lweaver@bfalaw.com

Plaintiffs' Co-Lead Counsel Additional counsel listed on signature page Orin Snyder (admitted *pro hac vice*) GIBSON, DUNN & CRUTCHER LLP

200 Park Avenue

New York, NY 10166-0193

Tel.: 212.351.4000 Fax: 212.351.4035

osnyder@gibsondunn.com

Deborah Stein (SBN 224570)

GIBSON, DUNN & CRUTCHER LLP

333 South Grand Avenue Los Angeles, CA 90071-3197

Tel.: 213.229.7000 Fax: 213.229.7520 dstein@gibsondunn.com

Attorneys for Defendant Facebook, Inc. Additional counsel listed on signature page

## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION

This document relates to:

ALL ACTIONS

MDL No. 2843
Case No. 18-md-02843-VC-JSC

JOINT STATEMENT REGARDING PENDING MOTIONS TO SEAL

On November 3, 2022, this Court ordered the parties to file by November 16, 2022, a "joint statement regarding the outstanding motions to seal documents related to the briefing on sanctions, including the transcripts and other materials requested by the Court." Dkt. 1072. The parties respectfully submit the following table. Consistent with this Court's Order, the table lists each document for which there is an outstanding motion to seal and, for each document, includes citations to (i) the docket number of the relevant motion to seal and (ii) the docket number of the statement in support of sealing and the proposed redacted version of the document. Each party takes no position on the other party's requests to seal.

\_

Most documents subject to an outstanding motion to seal were first filed under seal by Plaintiffs, as part of an Administrative Motion to Consider Whether Another Party's Material Should Be Sealed. A few others were first filed under seal by Facebook, also as part of an Administrative Motion to Consider Whether Another Party's Material Should Be Sealed. In such instances, the Motion to Seal column in the table indicates the initial filing and the Statement in Support of Sealing column in the table indicates the subsequent filing, in which the responding party identified those documents in the initial filing that contain materials it seeks to seal permanently. For sealing motions filed directly by Facebook, the Motion to Seal itself contains the support for sealing, and so the Statement in Support of Sealing column indicates "N/A." There were no sealing motions filed directly by Plaintiffs.

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
Facebook	Plaintiffs' Exhibit 1 to Loeser and Weaver Declaration ISO Motion for Sanctions ("Plaintiffs' Exhibit")	Dkt. 873 <sup>2</sup>	Dkt. 905	Dkts. 905- 5, 905-6	Limited portions that reveal confidential information regarding Facebook's ADI. Ex. 1 at 32–33, 38.
Facebook	Plaintiffs' Exhibit 16	Dkt. 873	Dkt. 905	Dkts. 905- 7, 905-8	Limited portions that reveal confidential information regarding Facebook's ADI. Ex. 16 at 395.
Facebook	Plaintiffs' Exhibit 17	Dkt. 873	Dkt. 905	Dkts. 905- 9, 905-10	Limited portions that reveal confidential information regarding Facebook's ADI. Ex. 17 at 1015.
Facebook	Plaintiffs' Exhibit 18	Dkt. 873	Dkt. 905	Dkts. 905- 11, 905-12	Limited portions that reveal confidential information regarding Facebook's ADI. Ex. 18 at 1–14.

The table above does not 1

<sup>&</sup>lt;sup>2</sup> The table above does not list documents that were first filed under seal by Plaintiffs, as part of an Administrative Motion to Consider Whether Another Party's Material Should Be Sealed, and which Facebook did not subsequently seek to seal permanently. Those documents are not subject to an outstanding motion to seal. For the Court's convenience, we identify these documents in footnotes such as here—for Dkt. 873, Plaintiffs filed under seal the Loeser and Weaver Declaration ISO Motion for Sanctions and all Exhibits 1–68 thereto. In its Statement ISO Plaintiffs' Motion to Seal, however, Facebook did not seek to permanently seal any portion of the Loeser and Weaver Declaration or Exhibits 2–15, 20–22, 24, 28–30, 35–50, 52–54, 56–59, and 62 thereto. *See* Dkt. 905. This Court's order, Dkt. 1048, mooted Facebook's sealing request for limited portions of Plaintiffs' Motion for Sanctions, and the Corrected Version thereof. *See* Dkt. 1050.

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
Facebook	Plaintiffs' Exhibit 19	Dkt. 873	Dkt. 905	Dkts. 905- 13, 905-14	Limited portions that reveal confidential information regarding Facebook's ADI. Ex. 19 at 30, 105–106.
Facebook	Plaintiffs' Exhibit 23	Dkt. 873	Dkt. 905	Dkts. 905- 15, 905-16	Limited portions that reveal confidential information regarding Facebook's ADI. Ex. 23 at 2.
Facebook	Plaintiffs' Exhibit 25	Dkt. 873	Dkt. 905	Dkts. 905- 17, 905-18	Limited portions that reveal confidential information regarding Facebook's ADI. Ex. 25 at 6.
Facebook	Plaintiffs' Exhibit 26	Dkt. 873	Dkt. 905	Dkts. 906- 1, 906-2	Limited portions that reveal confidential information regarding Facebook's ADI. Ex. 26 at 1–4.
Facebook	Plaintiffs' Exhibit 27	Dkt. 873	Dkt. 905	Dkts. 906- 3, 906-4	Limited portions that reveal confidential information regarding Facebook's ADI. Ex. 27 at 2–3.
Facebook	Plaintiffs' Exhibit 31	Dkt. 873	Dkt. 905	Dkts. 906- 5, 906-6	Limited portions that reveal confidential information regarding Facebook's ADI. Ex. 31 at 3426.
Facebook	Plaintiffs' Exhibit 32	Dkt. 873	Dkt. 905	Dkts. 906- 7, 906-8	Limited portions that reveal confidential information regarding Facebook's ADI. Ex. 32 at 3553.
Facebook	Plaintiffs' Exhibit 33	Dkt. 873	Dkt. 905	Dkts. 906- 9, 906-10	Limited portions that reveal confidential information regarding Facebook's ADI. Ex. 33 at 3648–4483.
Facebook	Plaintiffs' Exhibit 34	Dkt. 873	Dkt. 905	Dkts. 906- 11, 906-12	Limited portions that reveal confidential information regarding Facebook's ADI. Ex. 34 at 253.
Facebook	Plaintiffs' Exhibit 51	Dkt. 873	Dkt. 905	Dkts. 906- 13, 906-14	Limited portions that reveal confidential information regarding Facebook's ADI. Ex. 51 at 3426.
Facebook	Plaintiffs' Exhibit 55	Dkt. 873	Dkt. 905	Dkts. 906- 15, 906-16	Limited portions that reveal confidential information regarding Facebook's ADI. Ex. 55 at 11.

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
Facebook	Plaintiffs' Exhibit 60	Dkt. 873	Dkt. 905	Dkts. 906- 17, 906-18	Limited portions that reveal confidential information regarding Facebook's ADI. Ex. 60 at 3549.
Facebook	Plaintiffs' Exhibit 61	Dkt. 873	Dkt. 905	Dkts. 906- 19, 906-20	Limited portions that reveal confidential information regarding Facebook's ADI. Ex. 61 at 2652.
Facebook	Plaintiffs' Exhibit 63	Dkt. 873	Dkt. 905	Dkt. 906- 21	Sealed in its entirety because any portion of the document, if publicly disclosed, would reveal confidential information regarding Facebook's ADI.
Facebook	Plaintiffs' Exhibit 64	Dkt. 873	Dkt. 905	Dkts. 906- 22, 906-23	Limited portions that reveal confidential information regarding Facebook's ADI. Ex. 64 at 4368.
Facebook	Plaintiffs' Exhibit 65	Dkt. 873	Dkt. 905	Dkt. 907-1	Sealed in its entirety because any portion of the document, if publicly disclosed, would reveal confidential information regarding Facebook's ADI.
Facebook	Plaintiffs' Exhibit 66	Dkt. 873	Dkt. 905	Dkt. 907-2	Sealed in its entirety because any portion of the document, if publicly disclosed, would reveal confidential information regarding Facebook's ADI.
Facebook	Plaintiffs' Exhibit 67	Dkt. 873	Dkt. 905	Dkt. 907-3	Sealed in its entirety because any portion of the document, if publicly disclosed, would reveal confidential information regarding Facebook's ADI.
Facebook	Plaintiffs' Exhibit 68	Dkt. 873	Dkt. 905	Dkt. 907-4	Sealed in its entirety because any portion of the document, if publicly disclosed, would reveal confidential information regarding Facebook's ADI.
Facebook	Exhibit 7 to Stein	Dkt. 910	N/A	Dkts. 910- 3, 910-4	Limited portions previously sealed by the Court (filed with redactions at Dkt. 813-1 at 3426, granted at Dkt. 844).

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
	Declaration ISO Facebook's Opposition to Motion for Sanctions ("Defendant's Exhibit")				
Facebook	Defendant's Exhibit 8	Dkt. 910	N/A	Dkts. 910- 5, 910-6	Limited portions previously sealed by the Court (filed with redactions at Dkt. 813-1 at 3550, granted at Dkt. 844).
Facebook	Defendant's Exhibit 9	Dkt. 910	N/A	Dkts. 910- 7, 910-8	Limited portions previously sealed by the Court (filed with redactions at Dkt. 813-1 at 3553, granted at Dkt. 844).
Facebook	Defendant's Exhibit 20	Dkt. 910	N/A	Dkts. 910- 9, 910-10	Limited portions previously sealed by the Court (filed with redactions at Dkt. 813-1 at 3568–95, granted at Dkt. 844).
Facebook	Defendant's Exhibit 22	Dkt. 910	N/A	Dkts. 910- 11, 910-12	Limited portions previously sealed by the Court (filed with redactions at Dkt. 761, granted at Dkt. 764).
Facebook	Defendant's Exhibit 23	Dkt. 910	N/A	Dkts. 910- 13, 910-14	Limited portions previously sealed by the Court (filed with redactions at Dkt. 767, granted at Dkt. 770).
Facebook	Defendant's Exhibit 25	Dkt. 910	N/A	Dkts. 910- 15, 910-16	Limited portions previously sealed by the Court (filed with redactions at Dkt. 813-1 at 9, granted at Dkt. 844).
Facebook	Defendant's Exhibit 26	Dkt. 910	N/A	Dkts. 910- 17, 910-18	Limited portions previously sealed by the Court (filed with redactions at Dkt. 804-3 at 6, granted at Dkt. 844).
Facebook	Defendant's Exhibit 29	Dkt. 910	N/A	Dkts. 910- 19, 910-20	Limited portions that reveal the identities of consulting experts related to ADI. Ex. 29 at 2.

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
Facebook	Defendant's Exhibit 32	Dkt. 910	N/A	Dkts. 910- 21, 910-22	Limited portions previously sealed by the Court (filed with redactions at Dkt. 820-3, granted at Dkt. 839).
Facebook	Defendant's Exhibit 35	Dkt. 910	N/A	Dkts. 910- 23, 910-24	Limited portions that reveal the identities of consulting experts related to ADI and other confidential information regarding ADI. Ex. 35 at 5, 19.
Facebook	Defendant's Exhibit 36	Dkt. 910	N/A	Dkts. 910- 25, 910-26	Limited portions that reveal the identities of consulting experts related to ADI. Ex. 36 at 1–2.
Facebook	Defendant's Exhibit 38	Dkt. 910	N/A	Dkts. 910- 27, 910-28	Limited portions previously sealed by the Court (filed with redactions at Dkt. 870, granted at Dkt. 891).
Facebook	Defendant's Exhibit 41	Dkt. 910	N/A	Dkts. 910- 29, 910-30	Limited portions previously sealed by the Court (sought to be sealed entirely at Dkt. 814 at 4343, granted at Dkt. 844). These portions reveal identities of certain Facebook business partners and the names and details of Facebook's data systems. Ex. 41 at 6–9, and 2–3 of Ex. B to Ex. 41.
Plaintiffs	Stein Declaration ISO Facebook's Opposition to Motion for Sanctions	Dkt. 913	Dkt. 919	Dkts. 913- 3, 913-4	Portions contain Plaintiffs' personally identifiable information, private web browsing history, and private information collected and inferred from their interactions on and off the Facebook platform. Decl. at ¶¶ 12(c)–(d) and 15(qq).
Plaintiffs	Defendant's Exhibit 41	Dkt. 913	Dkt. 919	Dkts. 913- 5, 913-6	Portions contain Plaintiffs' personally identifiable information, private web browsing history, and private information collected and inferred from their interactions on and off the Facebook platform.

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
					Ex. C to Ex. 41 at 44, 46, 48–56, 58–60, 62–64, 66–70, 72–76, 78–82, 84–86, 88.
Plaintiffs	Defendant's Exhibit 43	Dkt. 913	Dkt. 919	Dkt. 913-7	Sealed in its entirety because the entire document reflects Plaintiff's personally identifiable information, private web browsing history, and private information collected and inferred from interactions on and off the Facebook platform.
Facebook	Plaintiffs' Exhibit 73 to Weaver and Loeser Declaration ISO Plaintiffs' Reply ISO Motion for Sanctions ("Plaintiffs' Reply Exhibit")	Dkt. 921 <sup>3</sup>	Dkt. 927	Dkt. 927-3	Limited portions that reveal confidential and competitively sensitive information regarding Facebook's business programs, strategies, decisions, and partners. Ex. 73 at 2, 4.  Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. <i>Id.</i> at 1, 2, 4, Internal Ex. B.
Facebook	Plaintiffs' Reply Exhibit 74	Dkt. 921	Dkt. 927	Dkt. 927-4	Limited portions previously sealed by the court. Ex. 74 at Ex. B (see Dkt. 813), Ex. C (see Dkt. 767-3).

\_

<sup>&</sup>lt;sup>3</sup> Plaintiffs filed under seal their Reply ISO Motion for Sanctions, the Weaver and Loeser Declaration ISO Plaintiffs' Reply ISO Motion for Sanctions, and Exhibits 71–74 and 86–87 thereto. Dkt. 921. In its Statement ISO Plaintiffs' Motion to Seal, however, Facebook did not seek to permanently seal any portion of Plaintiffs' Reply ISO Motion for Sanctions, the Weaver and Loeser Declaration, or Exhibits 71–73 thereto. Dkt. 927.

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
					Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. <i>Id.</i> at 1, 2, 4, Internal Ex. A in its entirety.
					Limited portions that reveal confidential and competitively sensitive information regarding Facebook's business programs, strategies, decisions, and partners. <i>Id.</i> at 6–7.
Facebook	Plaintiffs' Reply Exhibit 86	Dkt. 921	Dkt. 927	Dkt. 927-5	Limited portions that reveal confidential and competitively sensitive information regarding Facebook's business programs, strategies, decisions, and partners. Ex. 86 at 3, 7–8, 10–12.
Facebook	Plaintiffs' Reply Exhibit 87	Dkt. 921	Dkt. 927	Dkt. 927-6	One portion that reveals the password to a document repository for the litigation in this action. Ex. 87 at 4.
Facebook	Plaintiffs' Reply Exhibit 88	Dkt. 921	Dkt. 927	Dkt. 927-7	One portion that reveals Facebook's confidential information that the Court previously sealed. Ex. 88 at 59:18 (see Dkt. 820-3).
Facebook	Special Master's Order Following May 17, 2022 Hearing Regarding Production of Named Plaintiff Data	Dkt. 948	N/A	Dkts. 948- 3, 948-4	One portion that reveals confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Order at 1:16–17.

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
Facebook	Special Master's Amended Order Regarding Production of Named Plaintiff Data and the Exhibits thereto	Dkt. 981	N/A	Dkts. 981-3, 981-4	Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Order at ¶ 18–21, 18 n.2, 24, 26, 32; Order Ex. I at Tr. at 8:13–25, 9:1–8, 24–25, 10:1–2, 7–8, 10, 13–14, 21, 24–25, 11:1, 11, 11:13–15, 20–25, 12:8, 13:19–23, 25, 14:1–4, 8, 18, 22, 25, 15:12–20, 22–25, 16:2, 7, 10, 17:8, 18:8, 19, 22–23, 19:5–6, 12–13, 16–21, 23–25, 20:1, 3–9, 13–21, 21:2, 8–10, 15–16, 25, 22:2, 7, 13–15, 17–22, 23:5–9, 13, 15, 21–24, 24:12–14, 17–18, 20–21, 24, 25:8, 11, 17, 22, 26:6, 11–15, 17–20, 22–25, 27:1–3, 6, 9, 17, 29:2–5, 10–11, 14–15, 21–23, 25, 30:4, 7–8, 11, 14–17, 19–20, 25, 31:2, 11–13, 32:5–7, 12, 17–18, 21–24, 33:17, 19, 21–23, 25, 34:1, 4, 9, 12–13, 16, 18–21, 23, 35:10–11, 36:3, 7, 18, 37:10–14, 20–21, 23–24, 38:2, 9–10, 24–25, 39:1–3, 9, 21, 24, 40:5–8, 10, 41:2, 6, 18, 42:4, 10–11, 14–15, 43:1–4, 24, 44:2–4, 15, 45:2–3, 7, 13–14, 17–20, 46:14, 16, 47:13, 21, 48:12, 24, 49:3, 9–11, 18, 20–21, 51:8, 16, 52:9–14, 54:5, 14–15, 20–24, 55:1, 4–5, 24, 56:15, 57:3, 10–11, 18, 58:15, 59:8, 21–22, 60:12–15, 22, 61:1, 11, 15, 21, 24, 62:10, 14, 24, 63:6–7, 9, 18, 64:5, 7, 12, 14, 18, 25, 65:6, 25, 66:4–5, 25, 67:4–7, 16–22, 24, 68:2, 16, 20–21, 69:3, 12, 23, 70:2, 4–5, 8, 12–13, 71:24, 72:5, 10, 73:5, 25, 74:23, 75:15, 76:2–7, 10, 12, 15, 18, 77:3, 78:16–20, 23–25, 80:9, 81:25, 82:1–2, 5–6, 84:25, 85:11, 19, 86:11, 87:2, 7, 12, 20, 88:10, 20, 23, 25, 90:8, 91:20, 92:5–7, 9, 21, 93:4, 14, 16, 19, 94:7, 10, 13–14, 95:6, 11, 14, 18, 96:6, 8, 19, 22, 97:8, 13, 21–22, 98:3, 6, 10, 14, 20–21, 23–24, 99:1, 4, 17, 20, 25, 100:3, 13, 101:5, 13, 19, 23, 102:1, 8, 10–12, 103:3, 5, 10, 12–14, 104:17–19, 105:23–24, 106:11–13, 15, 19, 23, 25, 107:1, 8–9, 13, 20, 108:3, 13, 15, 19, 22, 25, 109:5–8, 13, 19, 110:3, 12, 15, 22, 24 111:3, 6, 8, 15, 17, 19, 112:2, 4–6, 9, 12,

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
					113:2, 13, 15, 18, 21, 114:11, 18, 21, 25, 115:3, 11, 116:10, 18–20,
					119:3–5, 18–19, 21–22, 121:16–17, 126:3–4, 6–10, 12, 16, 127:1, 4,
					6-8, 11-13, 16-20, 22, 24-25, 128:7, 11-12, 131:16-17, 21-22,
					132:2–3, 133:13; Order Ex. J; Order Ex. K at 2–7; Order Ex. L at Tr.
					at 28:17–23, 29:16–23, 30:3, 16, 22, 31:6–7, 42:21–23, 43:1, 5, 7–8,
					13, 21, 44:1, 6–7, 13–16, 19, 45:1, 3, 19, 21, 47:6–7, 54:5–6, 12, 66:18, 22, 67:1, 7, 10, 12, 14–15, 17–19, 68:9, 11–13, 16, 19-21,
					70:21–71:2, 83:9–10, 84:17, 85:22, 24, 91:8–9, 14–15, 92:16, 18,
					93:2-4, 94:8-9, 14, 19-23, 96:3, 5-6, 8, 19, 21, 25, 97:4, 98:1, 3, 10-
					13, 99:8, 100:5, 11, 14, 17–18, 105:9–22, 106:2, 110:22, 111:20,
					112:1, 4–5, 18, 116:18–20, 121:19–22, 124:17, 130:2–3, 25, 131:10–
					11, 13–15, 132:12, 133:10–12, 14-16, 135:16–21, 140:9, 146:23–
					147:9, 151:5, 11–12, 15, 153:22, 25, 154:1, 4, 10, 13–14, 20, 23–24,
					155:2-3, 9, 18, 21, 24, 156:7, 14, 157:5-6, 10, 13, 16, 19, 25, 158:1-
					2, 5, 15–16, 19–21, 25, 159:1–2, 160:8, 11, 20, 161:14, 23–24,
					162:7–8, 10, 22, 25, 163:4, 8, 14, 24, 164:3, 5–6, 14, 18, 23, 166:13–
					15, 19, 167:5, 21–24, 168:1, 7, 23–24, 169:3, 6; Order Ex. N at Tr. at
					16:7–8, 15–16, 22, 17:8, 11, 14–16, 18–19, 18:7, 9–11, 22–24, 19:16,
					20:6, 21:9–14, 23–25, 27:6–7, 10, 13, 15–16, 19–22, 24–25, 28:2–4,
					9-17, 20-22, 29:1-4, 21, 30:1-7, 18-25, 31:1, 8-10, 14, 24, 33:4,
					13–14, 23–25, 34:4–5, 35:1, 36:8–12, 14–15, 18, 21, 24–25, 37:6–7,
					10–14, 16–20, 22–23, 25, 38:4, 11, 19, 25, 39:3, 8, 44:10–14, 50:15–
					21, 51:9, 12–16, 19, 23–25, 52:1, 9–12, 24–25, 53:9–10, 54:5, 11–14,
					55:11–14, 56:1–3, 17–24, 57:1–2, 4–5, 7–11, 15–16, 67:22–25, 68:1–
					3, 69:18–21, 72:24–25, 73:4, 21–23, 74:3–6, 75:4–8, 13, 18–25,
					76:2-7, 14-16, 18, 21, 23-25, 81:1-2, 23-25, 82:14, 85:1-2, 86:13-
					14, 88:13–25, 89:1–2, 90:20–25, 91:1–4, 92:2, 5–6, 13, 18–24, 93:1–

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
					4, 102:17–18, 103:2, 4, 12, 105:16, 21–22, 106:3–6, 8, 17, 25, 107:15, 108:7, 23–25, 109:2, 11–15, 18–20, 25, 110:2, 6, 10, 15, 111:10, 14–19, 112:2, 5, 7, 20-25, 113:1–4, 16, 114:17, 24, 115:7, 118:2–9, 11–16, 119:8–11, 14–17, 19–21, 25, 120:1–7, 17–21, 23–24, 121:3–4, 6, 8–11, 124:22, 127:1–2, 10–11, 13–17, 19–21, 23–25, 130:10, 19, 21, 135:3–6, 140:23–24, 142:1, 15, 143:20–25, 145:3–4, 6–8, 12–13; Order Ex. N at Tr. at 146:2, 4, 9–10, 147:13–14, 148:4, 151:23, 152:3, 7; Order Ex. Q at 6–7; Order Ex. S at 4; Order Ex. T at 1–3, Internal Ex. A at 1–6; Order Ex. U at 1–3; Order Ex. V at 2–7, Internal Ex. A at 1–3, 5–7; Order Ex. W at 1, 3; Order Ex. X at 1–3.
					Limited portions that reveal confidential information regarding Facebook's tool for responding to law-enforcement requests for user records. Order at ¶¶ 19–23, 28, 30; Order Ex. V at 2–5, 7, Internal Ex. A at 1–6; Order Ex. W at 1–2; Order Ex. X at 1–2.
					Limited portions that contain confidential information that the Court previously found good cause to seal, which redactions Special Master Garrie included in the otherwise unredacted version of his Order and associated exhibits. Order Ex. D at 9–10, 12. <i>See</i> Dkt. 637.
					Limited portions that contain confidential information that the Court previously found good cause to seal. Order Ex. H at 1–4. <i>See</i> Dkt. 844.
					The identities of consulting experts related to ADI, whose identities the Court has previously found good cause to seal. Order Ex. I at Tr. at 133:13. <i>See</i> Dkts. 737, 764, 836, 837, 838, 839, 891.

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
					The names of Facebook's confidential business partners, which the Court has previously found good cause to seal. Order Ex. L at Tr. at 139:21, 140:2–3; Order Ex. N at Tr. at 66:4, 11, 138:24, 139:24–25, 141:1, 142:18. <i>See</i> Dkt. 844.
					Limited portions that reveal confidential information regarding Facebook's privacy and platform policy enforcement practices. Order Ex. L at Tr. at 128:10–11, 13–16, 158:11–12; Order Ex. N. at Tr. at 26:3–7, 58:11–14, 16–18, 59:1.
					Limited portions that reveal regarding confidential and competitively sensitive information regarding Facebook's employees, Facebook's business programs, strategies, decisions, and partners, and Facebook's proprietary data systems and data storage and processing practices, with language that Facebook has previously requested that the Court seal. Order Ex. M at 6–9; Order Ex. P at 1–2, 4, 6–7; Order Ex. Q at 2–4, 6, 9–13; Order Ex. S at 2–3; Order Ex. T at 2; Order Ex. V at Internal Ex. A at 5.
Facebook	Weaver Declaration ISO Plaintiffs'	Dkt. 988 <sup>4</sup>	Dkts. 991, 992, 1012	Dkts. 1012-4, 1013-2	Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Weaver Decl. at ¶¶ 4, 53.

<sup>-</sup>

<sup>&</sup>lt;sup>4</sup> Plaintiffs filed under seal the Laufenberg and Melamed Declaration ISO Plaintiffs' Supplemental Brief ISO Motion for Sanctions, the Ko Declaration ISO Plaintiffs' Motion for Sanctions, and Exhibits 89–98, 100–34, and 136–39 to the Weaver Declaration. Dkt. 988. In its Amended Statement ISO Plaintiffs' Motion to Seal, however, Facebook did not seek to permanently seal any portion of the Laufenberg and Melamed Declaration ISO Plaintiffs' Supplemental Brief ISO Motion for Sanctions, the Ko Declaration ISO Plaintiffs' Motion for Sanctions, or Exhibits 89, 100–01, 107–08, 110–11, 113, 116, 118, 120, 126–28, 136 or 138. Dkt. 1012. This Court's order, Dkt. 1048,

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
	Supplemental Brief ISO Motion				Limited portions that reveal confidential information regarding Facebook's tool for responding to law-enforcement requests for user records. <i>Id.</i> at ¶ 5.
	Sanctions				Limited portions that reveal confidential information regarding ADI; the Court previously found good cause to seal similar information. <i>Id.</i> at ¶¶ 14–16, 18, 45. <i>See</i> Dkt. 838.
					Limited portions that reveal confidential and competitively sensitive information regarding Facebook's employees. <i>Id.</i> at ¶ 46.
Facebook	Plaintiffs' Exhibit 90 to the Weaver Declaration ISO Plaintiffs' Supplemental Brief ISO Motion for Sanctions ("Plaintiffs' Supplemental Exhibit")	Dkt. 988	Dkts. 991, 992, 1012	Dkt. 988-8	A report generated by Facebook's consulting experts during ADI to assist counsel in providing Facebook with legal advice, which the Court previously found good cause to seal. <i>See</i> Dkts. 737, 764, 836, 837, 838, 839, 891.

mooted Facebook's sealing request for limited portions of Plaintiffs' Supplemental Brief ISO Motion for Sanctions, and the Corrected Version thereof. *See* Dkt. 1050.

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
Facebook	Plaintiffs' Supplemental Exhibit 91	Dkt. 988	Dkts. 991, 992, 1012	Dkt. 988-9	Sealed in its entirety. The document is a report generated by Facebook's consulting experts during ADI to assist counsel in providing Facebook with legal advice; the Court previously found good cause to seal similar reports. <i>See</i> Dkt. 838.
Facebook	Plaintiffs' Supplemental Exhibit 92	Dkt. 988	Dkts. 991, 992, 1012	Dkt. 988- 10	Sealed in its entirety. The document is a report generated by Facebook's consulting experts during ADI to assist counsel in providing Facebook with legal advice; the Court previously found good cause to seal similar reports. <i>See</i> Dkt. 838.
Facebook	Plaintiffs' Supplemental Exhibit 93	Dkt. 988	Dkts. 991, 992, 1012	Dkt. 988- 11	Sealed in its entirety. The document is a report generated by Facebook's consulting experts during ADI to assist counsel in providing Facebook with legal advice; the Court previously found good cause to seal similar reports. <i>See</i> Dkt. 838.
Facebook	Plaintiffs' Supplemental Exhibit 94	Dkt. 988	Dkts. 991, 992, 1012	Dkt. 988- 12	Sealed in its entirety. The document is a report generated by Facebook's consulting experts during ADI to assist counsel in providing Facebook with legal advice; the Court previously found good cause to seal similar reports. <i>See</i> Dkt. 838.
Facebook	Plaintiffs' Supplemental Exhibit 95	Dkt. 988	Dkts. 991, 992, 1012	Dkts. 991- 5, 992-3	Limited portions that reveal confidential information regarding Facebook's tool for responding to law-enforcement requests for user records. Ex. 95 at Tr. at 40:2–6, 8–20, 23–24, 41:6–7, 15–18, 20–25, 42:1–19, 22.
					Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Ex. 95 at Tr. at 69:11–25.

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
Facebook	Plaintiffs' Supplemental Exhibit 96	Dkt. 988	Dkts. 991, 992, 1012	Dkts. 991- 6, 992-4	Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Ex. 96 at 1–4.
					Limited portions that reveal confidential information regarding Facebook's tool for responding to law-enforcement requests for user records. <i>Id.</i> at 2–3.
Facebook	Plaintiffs' Supplemental Exhibit 97	Dkt. 988	Dkts. 991, 992, 1012	Dkts. 991- 7, 992-5	Confidential information regarding Facebook's tool for responding to law-enforcement requests for user records. Ex. 97 at 1–2, Internal Ex. A.
					Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. <i>Id.</i> at 1, 3.
Facebook	Plaintiffs' Supplemental Exhibit 98	Dkt. 988	Dkts. 991, 992, 1012	Dkts. 1012-5, 1013-3	Limited portions that reveal confidential and competitively sensitive information regarding Facebook's business programs, strategies, decisions, and partners. Ex. 98 at Tr. at 69:20–22, 25, 70:1–4, 8–23, 88:9–13, 144:25, 145:1–13, 158:14–17.
					Limited portions that reveal confidential information regarding Facebook's employees. <i>Id.</i> at Tr. at 88:4–6, 9–13.
					Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. <i>Id.</i> at Tr. at 88:20–21, 23, 89:3, 90:1–2, 11, 14–15, 20, 22, 91:7, 131:2–3, 8, 17, 329:12–25, 330:1–12, 334:6, 335:9, 11–12, 14, 20, 24, 336:2, 8, 337:23–24, 5–7, 12.

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
Facebook	Plaintiffs' Supplemental Exhibit 102	Dkt. 988	Dkts. 991, 992, 1012	Dkts. 1012-6, 1013-4	Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Ex. 102 at 1–3.
Facebook	Plaintiffs' Supplemental Exhibit 103	Dkt. 988	Dkts. 991, 992, 1012	Dkts. 1012-7, 1013-5	Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Ex. 103 at Tr. at 131:24, 132:5–8, 10–11, 25, 133:1–2, 134:20–21, 136:25, 217:1–9, 15–18.
Facebook	Plaintiffs' Supplemental Exhibit 104	Dkt. 988	Dkts. 991, 992, 1012	Dkts. 1012-8, 1013-6	Mediation tracker containing confidential and competitively sensitive information. Ex. 104 at Internal Ex. C.  Limited portions that reveal confidential and competitively sensitive information regarding Facebook's business programs, strategies, decisions, and partners. Ex. 104 at Internal Ex. G at Tr. at 611:1–3, 6–8, 10, 12–15, 19–20, 25, 612:1, 616:18–19, 21–22.  Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Ex. 104 at Internal Ex. H at Tr. at 131:24, 132:5–8, 10–11,
Facebook	Plaintiffs' Supplemental Exhibit 105	Dkt. 988	Dkts. 991, 992, 1012	Dkts. 991- 8, 992-6	25, 133:1–2, 25, 134:20–21, 136:25; Internal Ex. M at 2.  Limited portions that reveal confidential and competitively sensitive information regarding Facebook's business programs, strategies, decisions, and partners. Ex. 105 at Tr. at 266:11–13, 18–20, 268:2–3, 20–23, 269:2–6, 270:1–2, 273:5–8, 14–15, 281:25–282:6.
Facebook	Plaintiffs' Supplemental Exhibit 106	Dkt. 988	Dkts. 991, 992, 1012	Dkts. 991- 9, 992-7	Limited portions that reveal confidential and competitively sensitive information regarding Facebook's business programs, strategies, decisions, and partners. Ex. 106 at Tr. at 92:1–2, 4, 7–12, 20, 22–23,

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
					25, 94:1–9, 13, 19–22, 24–25, 101:15–17, 24, 104:1–4, 25, 105:1–4, 7, 9–10, 24–25, 118:2–3, 9–11, 14, 17–19, 119:2–3, 19–20, 161:1–5, 9–10, 13, 20, 23–25, 163:2–4, 9–11, 13–15, 24–25, 164:1–3, 6–8, 12–15, 21–23, 165:1–3, 8–10, 13–14, 168:15–16, 19–20, 24–25, 169:1, 6–7, 20–21, 23–25, 170:1–5, 7, 14–16, 182:4–12, 19–21, 24–25, 224:2, 4, 11–22, 226:6–7, 11–12, 14, 24–25, 240:3–6, 10–11; Internal Ex. 0007 at 1–3; Internal Ex. 0013 at 1–5.
Facebook	Plaintiffs' Supplemental Exhibit 109	Dkt. 988	Dkts. 991, 992, 1012	Dkts. 991- 10, 992-8	Limited portions that reveal confidential information regarding Facebook's business partners. Ex. 109 at 3.
Facebook	Plaintiffs' Supplemental Exhibit 112	Dkt. 988	Dkts. 991, 992, 1012	Dkts. 1012-9, 1013-7	Limited portions that reveal confidential and competitively sensitive information regarding Facebook's employees. Ex. 112 at 1–5. Limited portions that reveal confidential information regarding Facebook's business partners. <i>Id.</i> at 2–7.
					Limited portions that reveal confidential information regarding Facebook's privacy and platform policy enforcement practices. <i>Id.</i> at 1–2, 4.
Facebook	Plaintiffs' Supplemental Exhibit 114	Dkt. 988	Dkts. 991, 992, 1012	Dkt. 988- 31	Sealed in its entirety because it contains confidential information that the Court previously found good cause to seal. <i>See</i> Dkt. 437.
Facebook	Plaintiffs' Supplemental Exhibit 115	Dkt. 988	Dkts. 991, 992, 1012	Dkts. 991- 11, 992-9	Confidential information that the Court previously found good cause to seal. Ex. 115 at 1–5. <i>See</i> Dkt. 641.

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
Facebook	Plaintiffs' Supplemental Exhibit 117	Dkt. 988	Dkts. 991, 992, 1012	Dkts. 991- 12, 992-10	Confidential information that the Court previously found good cause to seal. Ex. 117 at 1. <i>See</i> Dkt. 844.
Facebook	Plaintiffs' Supplemental Exhibit 119	Dkt. 988	Dkts. 991, 992, 1012	Dkts. 1012-10, 1013-8	Limited portions that reveal confidential and competitively sensitive information regarding Facebook's business programs, strategies, decisions, and partners. Ex. 119 at 6.
					Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. <i>Id.</i> at 7.
Facebook	Plaintiffs' Supplemental Exhibit 121	Dkt. 988	Dkts. 991, 992, 1012	Dkt. 988- 38	Sealed in its entirety because it contains confidential and competitively sensitive information regarding ADI.
Facebook	Plaintiffs' Supplemental Exhibit 122	Dkt. 988	Dkts. 991, 992, 1012	Dkt. 988- 39	Sealed in its entirety because it contains confidential and competitively sensitive information regarding ADI and about Facebook employees.
Facebook	Plaintiffs' Supplemental Exhibit 123	Dkt. 988	Dkts. 991, 992, 1012	Dkts. 1012-11, 1013-9	Limited portions that reveal confidential and competitively sensitive information regarding Facebook's business programs, strategies, decisions, and partners. Ex. 123 at 1–2, 6, 9, 16–19, 23, 28.
					Limited portions that reveal confidential and competitively sensitive information regarding Facebook's employees. <i>Id.</i> at 1–37.
Facebook	Plaintiffs' Supplemental Exhibit 124	Dkt. 988	Dkts. 991, 992, 1012	Dkts 1012-12, 1013-10	Limited portions that reveal confidential and competitively sensitive information regarding Facebook's employees. Ex. 124 at 1, 3, 4.

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
					Limited portions that reveal confidential and competitively sensitive information regarding Facebook's partners. <i>Id.</i> at 4.
Facebook	Plaintiffs' Supplemental Exhibit 125	Dkt. 988	Dkts. 991, 992, 1012	Dkts 1012-13, 1013-11	Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Ex. 125 at 3.
Facebook	Plaintiffs' Supplemental Exhibit 129	Dkt. 988	Dkts. 991, 992, 1012	Dkts 1012-14, 1013-12	Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Ex. 129 at 1; Internal Attachment at 1–28.
Facebook	Plaintiffs' Supplemental Exhibit 130	Dkt. 988	Dkts. 991, 992, 1012	Dkt. 988- 47	Sealed in its entirety because it is a mediation tracker containing confidential and competitively sensitive information.
Facebook	Plaintiffs' Supplemental Exhibit 131	Dkt. 988	Dkts. 991, 992, 1012	Dkt. 988- 48	Sealed in its entirety because it is a mediation tracker containing confidential and competitively sensitive information.
Facebook	Plaintiffs' Supplemental Exhibit 132	Dkt. 988	Dkts. 991, 992, 1012	Dkt. 988- 49	Sealed in its entirety because it is a mediation tracker containing confidential and competitively sensitive information.
Facebook	Plaintiffs' Supplemental Exhibit 133	Dkt. 988	Dkts. 991, 992, 1012	Dkt. 988- 50	Sealed in its entirety because it is a mediation tracker containing confidential and competitively sensitive information.
Facebook	Plaintiffs' Supplemental Exhibit 134	Dkt. 988	Dkts. 991, 992, 1012	Dkt. 988- 51	Sealed in its entirety because it is a mediation tracker containing confidential and competitively sensitive information.

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
Facebook	Plaintiffs' Supplemental Exhibit 137	Dkt. 988	Dkts. 991, 992, 1012	Dkts. 991- 13, 992-11	Confidential information that the Court previously found good cause to seal. Ex. 137 at 2–6. <i>See</i> Dkt. 641.
Facebook	Plaintiffs' Supplemental Exhibit 139	Dkt. 988	Dkts. 991, 992, 1012	Dkts. 1012-15, 1013-13	Limited portions that reveal confidential and competitively sensitive information regarding Facebook's business programs, strategies, decisions, and partners. Ex. 139 at 1–2.  Limited portions that reveal confidential and competitively sensitive information regarding Facebook's employees. <i>Id.</i> at 1.
Facebook	Corrected Weaver Declaration ISO Plaintiffs' Supplemental Brief ISO Motion for Sanctions	Dkt. 1007	Dkt. 1037	Dkts. 1037-5, 1037-6	Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Weaver Decl. at ¶¶ 4, 47, 53.  Limited portions that reveal confidential information regarding Facebook's tool for responding to law-enforcement requests for user records. <i>Id.</i> at ¶ 5.  Limited portions that reveal confidential information regarding ADI; the Court previously found good cause to seal similar information. <i>Id.</i> at ¶¶ 14–16, 18, 45. <i>See</i> Dkt. 838.  Limited portions that reveal confidential and competitively sensitive information regarding Facebook's employees. <i>Id.</i> at ¶ 46.
Facebook	Plaintiffs' Exhibit 5 (Hendrix Dep. Tr.)	Dkts. 934, 1005	Dkts. 938, 1038, 1046	Dkts. 1038-3, 1038-11	The names of two confidential business partners. Ex. 5 at 255:8, 258:14—15.

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
					Limited portions that reveal confidential information regarding Facebook's privacy and platform policy enforcement practices. <i>Id.</i> at 265:24—266:10, 267:5—13, 312:13–20, 314:6–13.
Facebook	Plaintiffs' Exhibit 31 (Papamiltiadis Dep. Tr.)	Dkt. 1001	Dkts. 1038, 1046	Dkts. 1046-3, 1046-4	Limited portions that reveal confidential information regarding Facebook's regulatory matters. Ex. 31 at 48:4–11, 49:1–10, 49:17–19.  Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. <i>Id.</i> at 69:5–6, 108:1–12, 113:13–23, 114:24–115:1, 129:9–25, 130:2–3, 155:15–18, 159:15–160:1, 160:14–20, 160:23–161:9, 161:13–25, 162:3–22, 163:3–7, 164:9–165:17, 165:23–166:14, 167:3–15, 167:23–168:1, 168:14–19, 169:12–23, 260:7–9, 260:11–24, 267:3–13, 269:5–7, 269:12–24, 270:1–3, 270:19–21, 273:4–7.  Limited portions that reveal confidential and competitively sensitive information regarding Facebook's business programs, strategies, decisions, and partners. <i>Id.</i> at 61:10–21, 65:12–14, 65:17–66:5, 66:19–23, 66:25–67:11, 69:11–13, 69:16–20, 69:22–25, 70:1–12, 70:20–25, 79:17–78:2, 80:20–81:19, 82:17–19, 83:24–84:1, 85:7–10, 85:13, 85:16–19, 86:9–10, 86:13–22, 88:24–89:2, 89:4–6, 89:8–13, 90:2–3, 90:5–11, 90:20–21, 90:23, 91:1–4, 91:8–10, 91:14, 91:24, 92:2–4, 92:14–16, 92:22–23, 97:3–5, 106:20–107:11, 107:15–16, 107:19–21, 107:22–24, 116:17–25, 130:21–24, 131:21–23, 132:1–4, 132:6–8, 132:19–21, 132:24–25, 144:8–9, 144:12–15, 144:20, 144:22–145:2, 149:4–6, 149:10–12, 152:8–13, 152:15–19, 152:25–153:2, 154:20–22, 154:24–155:3, 179:21–23, 179:25–180:4, 180:6–16, 180:22–25, 182:19–21, 182:23–183:17, 188:14–20, 198:17–

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
					199:8, 201:6–14, 210:11–212:6, 217:14–19, 217:21–24, 218:2–5, 218:8–12, 218:16–220:13, 221:7–222:9, 223:3–17, 223:21–224:20, 224:24–25, 225:2–12, 225:14–226:2, 226:4–15, 229:3–15, 231:1–6, 232:1–4, 232:8–10, 232:15–17, 234:2–14, 237:3–5, 237:7–10, 239:3–25, 240:1–25, 241:2–8, 243:22–24, 244:2–4, 244:7–9, 244:11–14, 244:17–18, 244:20–23, 245:1–246:6, 246:8, 246:10–15, 246:17–18, 246:20, 246:22–25, 247:2–9, 247:12–14, 247:18–21, 248:1–4, 248:6–9, 248:11–13, 248:17–19, 248:21–23, 248:25–249:5, 249:7–20, 249:22, 249:24–25, 259:1–2, 259:7–260:4, 263:7–9, 263:12–14, 263:16–264:21.
					Limited portions that reveal confidential information regarding Facebook's privacy and platform policy enforcement practices. <i>Id.</i> at 129:9–25, 130:2–3, 133:9–10, 133:12, 133:16–17, 133:20–22, 133:24, 134:3–5, 134:8–10, 134:12–13, 148:10–16, 197:12–16.
Facebook	Plaintiffs' Exhibit 95 (Duffey Dep. Tr.)	Dkt. 1001	Dkts. 1038, 1046	Dkts. 1038-5, 1038-13	Limited portions that reveal confidential information regarding Facebook's tool for responding to law–enforcement requests for user records. Ex. 95 at 38:17–19, 39:12, 39:15–18, 39:20–25, 40:2–9, 40:18–20, 40:22–24, 41:7, 41:16–18, 41:21–42:8, 42:10–14, 42:17–19, 43:21–22, 43:25, 44:2–7, 44:9, 44:11–20, 46:7–15, 47:2–11, 47:15–18, 47:25–48:3, 48:7–9, 48:15, 49:2, 49:11–12, 49:16–17, 49:21–25, 50:19–21, 50:24, 51:1–2, 51:5, 51:8–11, 51:17–18, 51:21–52:2, 52:24, 53:3–5, 53:9–10, 53:20–21, 53:24–54:9, 54:12, 54:15, 54:20, 55:3–4, 55:6–8, 55:11–13, 56:9–18, 56:23–57:4, 57:14–17, 57:20–23, 58:11–12, 58:24–59:2, 59:6–7, 59:9–12, 59:17–18, 59:21–22, 59:25–60:1, 60:4–6, 60:8–21, 60:15, 61:2–3, 61:11–12, 61:18–19, 61:24, 62:2–7, 62:10, 62:15–16, 62:23–25, 63:4, 63:13–15, 64:17–

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
					65:4, 65:16–18, 65:22–66:4, 66:14–15, 66:22–24, 67:2–3, 83:14–17, 84:2, 84:5, 85:17–22, 86:16–18, 154:3–6, 154:18–19, 156:16, 156:20–21, 158:1–2, 158:5–7, 164:4.
					Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. <i>Id.</i> at 69:13, 69:19, 69:23, 70:12–13, 72:21, 73:18, 73:20, 75:10, 75:19, 77:17, 79:6–7, 79:12, 79:16, 82:25, 83:23, 83:25, 84:5, 84:7, 93:24–94:1, 96:21–22, 96:25, 97:2, 97:9–10, 126:8–9, 154:21, 156:7, 158:12, 158:14, 161:2, 161:6, 163:24, 165:16, 168:18, 168:24, 173:3, 178:21, 184:6.
Facebook	Plaintiffs' Exhibit 98 (Leone Dep. Tr.)	Dkt. 1001	Dkts. 1038, 1046	Dkts. 1038-6, 1038-14	Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Ex. 98 at 98:19–20, 98:22, 99:3, 100:3, 100:13, 100:16–17, 100:22, 100:24, 101:10, 143:13–14, 143:19, 144:4, 351:3–5, 351:7–19, 351:23–352:5, 356:4, 357:9–10, 357:12, 357:18, 357:22, 357:25, 359:23–24, 360:7–9, 360:13.
					Limited portions that reveal confidential and competitively sensitive information regarding Facebook's business programs, strategies, decisions, and partners. <i>Id.</i> at 79:6–8, 79:11–12, 79:14–15, 79:19–80:5, 80:10–12, 98:2–4, 98:7–12, 157:25–158:14, 172:12–16.
Facebook	Plaintiffs' Exhibit 103 (Clark Dep. Tr.)	Dkt. 1001	Dkts. 1038, 1046	Dkts. 1038-7, 1038-15	Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Ex. 103 at 25:22–23, 34:14–15, 34:23–24, 35:2–3, 35:15, 35:17, 36:2–3, 36:8–16, 36:18, 36:21–22, 37:2–4, 37:6, 37:8–10, 37:17, 37:20–21, 40:13–14, 40:16–21, 41:4–9, 48:4–7, 48:17–19,

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
					52:18, 52:20–22, 53:4–9, 53:13–16, 53:21, 54:4–6, 54:14, 57:2–4,
					57:7–10, 57:13, 57:16, 57:20–24, 58:14–16, 58:25, 59:1–2, 59:22–23,
					60:2-8, 60:15-19, 61:2-7, 62:2-5, 62:10-19, 65:25, 67:8-10, 67:19-
					22, 67:25, 68:1–6, 68:8–10, 68:17–25, 70:17–20, 70:24–25, 71:2–5,
					71:9–11, 71:15–16, 71:21–22, 72:16–23, 73:4–10, 74:6, 74:14–15,
					74:18–22, 74:25, 75:10–22, 75:25, 76:2–7, 76:12, 76:19, 76:22–23,
					78:11, 78:14–19, 79:1–2, 79:4, 79:23–25, 80:1–2, 80:16–17, 80:19–20, 81:9–10, 82:5–7, 83:4–5, 84:9, 85:12, 85:14, 85:17, 85:24, 86:11,
					87:20, 93:12–15, 93:20–21, 95:19–20, 97:3–4, 97:6, 97:10–11, 98:13,
					99:2, 99:6–7, 99:9–10, 99:17–18, 99:25, 100:1–4, 100:12, 100:14–17,
					101:8–9, 101:11–12, 101:18–20, 102:4, 102:8–10, 102:25, 103:13,
					103:19, 105:16, 108:7–10, 108:17–18, 108:24, 109:1–3, 109:5–6,
					111:9–10, 111:22–25, 112:4, 112:6–8, 112:11, 112:21, 113:5–7,
					113:9–11, 113:19, 113:23–24, 114:16, 114:19–21, 115:1, 115:7–8,
					115:25, 116:1, 116:9–18, 131:24, 132:5–7, 132:10, 132:25, 133:1–2,
					134:20–21, 136:25, 137:1–3, 137:6–7, 137:18–19, 137:25, 138:1–6,
					139:12, 139:17, 139:19–25, 140:1, 140:5–11, 140:23, 141:1–5,
					141:7–13, 141:15–25, 142:1–8, 142:10, 142:12–14, 142:16–17,
					142:19, 142:21–22, 143:6–9, 144:10, 144:12–14, 158:14, 158:19,
					159:2–8, 159:22, 160:19–20, 160:22, 164:22–24, 165:1, 165:7–11,
					165:13, 165:15–16, 165:24, 166:3, 166:12, 166:16–18, 166:24–25,
					167:1, 167:4–5, 167:14–15, 167:18, 167:22–23, 167:25, 168:5,
					168:18–19, 168:22, 169:2–3, 169:6, 169:8–9, 169:13–17, 170:17–21,
					170:23, 171:5, 171:8, 171:19–20, 172:3, 172:7, 173:4, 173:6–7,
					173:10, 173:14, 173:20–24, 174:21–22, 175:5, 175:7–10, 175:21,
					175:23, 174:21–22, 175:5, 175:7–10, 175:21, 175:23, 176:1–4,
					176:8–10, 176:13–22, 177:1–6, 177:8–12, 177:15–17, 179:22–24,

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
					180:3, 180:18–19, 180:25, 181:1, 181:9–13, 181:16–17, 183:2–4, 183:6–7, 183:23–24, 184:2, 184:4, 184:9–10, 184:12–14, 187:11, 187:14–15, 187:20, 187:24–25, 188:2, 189:24–25, 190:1–2, 195:3, 195:7–8, 196:5–7, 196:10–13, 196:15, 196:17–20, 196:23–25, 197:1–2, 197:7–9, 197:12–15, 197:20–21, 197:23–25, 198:2–8, 198:10–12, 198:14–18, 199:5–11, 199:18–23, 200:5–8, 200:12–14, 201:4, 201:6–11, 201:13–14, 201:16, 201:19–22, 202:1–2, 202:5, 202:7–10, 202:18–19, 202:21, 206:8, 206:13–15, 206:21–22, 206:25, 207:1–2, 207:6–7, 209:3–12, 209:16–17, 209:21, 210:15–16, 211:5–6, 211:13, 211:20–22, 211:24–25, 212:1–2, 212:9–10, 216:22–24, 217:2–4, 217:7, 217:15–18, 227:7–8, 227:10–15, 227:18–19, 228:6–12, 229:18–19, 230:24–25, 231:1, 231:4–5, 231:7, 233:21–23, 233:25, 235:15–16, 235:18–20, 235:24–25, 236:1, 236:7, 236:13–15, 236:17–19, 237:7–9, 237:16–19, 237:21–25, 238:1.
					Limited portions that reveal confidential and competitively sensitive information regarding Facebook's business programs, strategies, decisions, and partners. <i>Id.</i> at 69:5–8, 69:13–17, 69:25, 70:1, 70:3–7, 70:13–14, 190:16, 190:25, 191:1–2, 212:14–15.
					Limited portions that reveal confidential information regarding Facebook's privacy and platform policy enforcement practices. <i>Id.</i> at 19:4–5, 19:7–8, 19:14–15.
Facebook	Plaintiffs' Exhibit 105 (Cross Dep. Tr.)	Dkts. 1001, 1067, 1070	Dkts. 1038, 1046, 1074	Dkts. 1038-8, 1038-16,	Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Ex. 105 at 169:7–8, 18, 170:17–18, 25, 171:3–5, 15–16, 18–19, 172:2, 6–7, 173:7, 10, 679:16–17, 19–25, 680:1–5, 7–9, 13, 20–22, 681:8–9, 13–16, 19–20, 22–23, 682:17–19, 684:4–8, 697:9–

1074-8 758:2–3, 5–9, 16–18, 20–21, 23–25, 759:1–2, 12, 25, 760:3–4, 8	Party Requesting Sealing	Title/ for Description N	for f Motion S to Seal I	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
$\begin{array}{c} 20,22,767:2-6,14,18-19,22-25,768:1-3,5-6,8-11,13-14,17,19-21,23-25,769:1-2,4,13-15,18-20,22-25,770:1-3,5-11,13-15,18-24,771:8-13,23-25,772:1,3-4,7-9,11-13,17,23,25,773:3,7,10,12,17-21,23-25,774:6-7,10-11,14-15,775:3-4,14-16,20-23,25,776:2,6-12,17-19,22-23,781:20-782:10-11,783:19,786:1,4-8,10-12,13-17,19-22,787:2-3,791:4-7,16-21,818:1-2,7-9,13,15-16,18-19,21-22,24-25,855:3-4,856:2,10-11,19,22-23,857:16-18,858:1-3,7-8,11-18-21,859:4-5,8-10,16-17,860:2-3,23,861:14-19,862:5-8,15,19,863:3,5-6,25,864:1-5,9-13,865:13-16,866:4,15-16,23,869:22-24,870:8-9,21,871:6,11,18,20-23,25,872:3-4,14,16,22-24,875:22-25,876:1-4,6-9,12,15-18,877:24-25,878:3-8,885:23-24,886:5-6,887:4-7,11-14,20,22-23,25,87:3-4,14,16,22-24,875:23-24,870:8-9,21,871:6,11,18,20-23,25,87:3-4,14,16,19,20-24,290:11,7,24-25,902:8-12,24-25,903:1-4,12-16,907:20-22,908:2-916:13-16,19-20,22,24,917:1,4,5-6,9-12,14-17,20-21,2918:1-2,4-7,9-10,919:12-14,16-22,920:4-6,8-9,921:21,292:4,6-8,13-14,16,19,21-24,923:1-4,9-14,924:1-3,5-6,11-17,19-23,925:4-7,9-16,18-21,23-25,927:1,4,6-11,15,23,928:3-5,10-12,18,21-23,25,929:10,13,17-19,22-23,93:5,8-9,14-15,18,931:4-8,12-14,17-19,22-24,933:3-4,9-14,15,18,931:4-8,12-14,17-19,22-24,933:3-4,9-14,15,18,931:4-8,12-14,17-19,22-24,933:3-4,9-14,15,18,931:4-8,12-14,17-19,22-24,933:3-4,9-14,15,18,931:4-8,12-14,17-19,22-24,933:3-4,9-14,15,18,931:4-8,12-14,17-19,22-24,933:3-4,9-14,15,18,931:4-8,12-14,17-19,22-24,933:3-4,9-14,15,18,931:4-8,12-14,17-19,22-24,933:3-4,9-14,15,18,931:4-8,12-14,17-19,22-24,933:3-4,9-14,15,18,931:4-8,12-14,17-19,22-24,933:3-4,9-14,15,18,931:4-8,12-14,17-19,22-24,933:3-4,9-14,15,18,931:4-8,12-14,17-19,22-24,933:3-4,9-14,15,18,931:4-8,12-14,17-19,22-24,933:3-4,9-14,15,18,931:4-8,12-14,17-19,22-24,393:3-4,9-14,15,18,931:4-8,12-14,17-19,22-24,393:3-4,9-14,15,20,22-24,934:7-9,18-21,935:5-6,12,22-23,936:9-1$					,	775:3-4, 14-16, 20-23, 25, 776:2, 6-12, 17-19, 22-23, 781:20-21, 782:10-11, 783:19, 786:1, 4-8, 10-12, 13-17, 19-22, 787:2-3, 791:4-7, 16-21, 818:1-2, 7-9, 13, 15-16, 18-19, 21-22, 24-25, 855:3-4, 856:2, 10-11, 19, 22-23, 857:16-18, 858:1-3, 7-8, 11-12, 18-21, 859:4-5, 8-10, 16-17, 860:2-3, 23, 861:14-19, 862:5-8, 11-15, 19, 863:3, 5-6, 25, 864:1-5, 9-13, 865:13-16, 866:4, 15-16, 21-23, 869:22-24, 870:8-9, 21, 871:6, 11, 18, 20-23, 25, 872:3-4, 8, 10,

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
					18–19, 22, 939:4–5, 7–8, 15, 17–18, 21–24, 940:2, 4–6, 942:2–9, 13,
					16, 943:11–15, 21, 944:12–13, 19–20, 945:25, 947:8, 11, 17, 20–25, 948:4, 6, 9–11, 15–18, 24–25, 949:1, 3, 5–6, 8–9, 12, 14, 17, 21–22,
					24–25, 950:2–6, 9–12, 14–15, 19–20, 23–25, 951:1–5, 7–9, 12–13,
					15-17, 20-25, 952:1-2, 4-5, 7, 9-12, 14-20, 22-23, 25, 953:1, 10-
					13, 16–17, 24–25, 954:2–3, 10–16, 20–21, 23–25, 955:2–4, 9, 11–12,
					18–20, 23, 25, 956:8, 11, 14–15, 18–19, 22, 24, 957:5, 8–9, 18–19,
					22–24, 958:2–8, 10–11, 14–15, 18, 22, 25, 959:3–6, 9, 12, 16, 21–22,
					24–25, 960:1–4, 7, 9, 14, 18–20, 22–24, 961:2–11, 963:15, 23–25,
					964:7–8, 11, 13, 965:18–21, 966:3–4, 9–11, 967:25, 968:4, 7–8,
					969:2-4, 6-10, 20, 22-24, 970:2, 4-10, 14-17, 21-23, 971:3-4, 6,
					11–13, 18–20, 22–23, 972:3–5, 7–12, 14–15, 17–21, 23, 973:6, 21, 25, 974:1, 7–9, 14–15, 19, 22, 975:2–7, 9–11, 13–15, 18–22, 24,
					23, 9/4:1, 7–9, 14–13, 19, 22, 9/3:2–7, 9–11, 13–13, 18–22, 24,   976:1–2, 4, 6–9, 13–14, 16, 18–23, 977:2–4, 6–8, 10–11, 13–16, 18–
					21, 979:9–10, 14–15, 19–25, 980:1–7, 9–10, 12–15, 19, 1006:4, 9–
					11, 14, 16–19, 1009:1–2, 4–5, 7, 9, 13, 16, 19, 1010:1–4, 6, 17, 19–
					20, 24–25, 1011:2–6, 8, 13–14, 19–21, 23–25, 1012:2, 5, 10–15, 17,
					21–25, 1013:4–5, 9, 12, 19, 23–25, 1014:1–2, 4–5, 8, 11, 13–14, 25,
					1015:11, 13, 16, 18–19, 1016:4, 7–14, 17–19, 24–25, 1017:2–6, 8–9,
					11, 14–16, 18, 22–23, 1018:1–3, 6–8, 10, 13–14, 19–21, 24, 1019:1,
					3, 5, 7, 10–11, 13–16, 21–23, 25, 1020:1, 6–7, 10, 12, 14–19, 21, 23,
					1021:3-4, 8, 11-13, 21, 1022:2, 5-6, 8, 10, 14, 18-19, 21, 23,
					1023:1–2, 4–5, 7, 11–12, 14, 16, 18, 19, 24–25, 1024:3, 8–9, 12–14,
					18–19, 21–22, 25, 1025:1, 3, 6, 10, 12, 15, 19, 23, 1026:1–4, 6–7, 10, 12–16, 19–21, 23–25, 1027:1, 2–5, 9–12, 22–24, 1028:7–11, 14–16,
					18, 22–24, 1030:4, 6–7, 9–17, 22–23, 25, 1031:1, 3–9, 11, 16–18, 22,
					1032:5-6, 15, 17-19, 25, 1033:1-2, 5-9, 16, 21, 24, 1034:2-5, 8-9,
				<u> </u>	1034.3-0, 13, 17-17, 23, 1033.1-2, 3-7, 10, 21, 24, 1034.2-3, 0-7,

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
					24, 1035:1–2, 11–13, 1036:7, 11, 14, 17–19, 21–25, 1037:1–2, 6, 9, 12, 15, 19, 21, 24–25, 1038:1–2, 4, 7–9, 13–14, 16, 19–23, 1039:4–6, 12, 15–18, 20–23, 1043:1, 2, 7–9, 12, 14–16, 18, 20–21, 23–24, 1044:1, 7–8, 18–20, 22, 25, 1045:3–4, 8, 10–11, 14–15, 17, 20–22, 24, 1046:1–2, 4, 21, 1047:4–5, 8, 10–11, 13–14, 17–18, 23, 25, 1048:4–5, 8, 11–16, 19, 23, 1049:11–12, 17, 21–22, 25, 1050:1, 6, 8–9, 14–15, 22–23, 1051:3, 6, 11, 14, 16–21, 24–25, 1052:1–4, 6–8, 10–14, 16–18, 1053:6–9, 11, 13–14, 18–21, 25, 1054:1–3, 8–12, 16–18, 1082:8, 11–13, 15–16, 20–21, 23–25, 1083:2, 4–5, 8, 12–14, 22, 25, 1084:1–3, 9–11, 16–18, 20, 23, 25, 1085:1–6, 9–11, 21, 1086:4, 7–9, 13–14, 18, 23–25, 1093:1–2, 4, 6–7, 1094:7–9, 20–25, 1095:7–8, 13–14, 16, 18, 1096:16, 18–22, 25, 1097:5, 7–10, 23–25, 1098:1, 16–17, 1099:2, 5–6, 9–10, 17–18, 25, 1100:3–5, 13–14, 20–21, 23, 1101:1, 3, 6–10, 1119:1, 3–5, 15–16, 25, 1120:1, 3–5, 9–11, 14–16, 1122:7–9, 1124:22–24, 1125:1–2, 6–7, 25, 1126:1, 7–8, 12–13, 16–17, 1127:1–2, 13–14, 1128:3, 6–7, 1130:15–17, 20–22, 1132:1, 9–10, 15, 18, 22, 1132:12–14, 23–25, 1152:12–14, 19–21, 1153:17–19, 21–22, 1154:14–15, 22–24, 1185:21–23, 1186:7–9, 12–13, 20–22, 1187:6–9, 15–18, 21–25, 1188:1, 15–16, 18–20, 23, 1206:23, 1207:20–21, 24.
					Limited portions that reveal confidential and competitively sensitive information regarding Facebook's business programs, strategies, decisions, and partners. <i>Id.</i> at 62:16–17, 19–22, 25, 63:1–2, 93:16, 18, 94:11, 19, 21, 95:8, 11–12, 17, 19, 96:5, 10, 20, 100:8–9, 126:8–12, 130:11, 14, 131:4, 7, 132:6–8, 12, 16–17, 19–20, 24, 237:21–24, 238:18, 252:15–16, 253:6–7, 266:11–13, 18–20, 268:2–3, 20–23,

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
					269:2-6, 270:1-2, 273:5-8, 14-15, 274:22, 275:12, 277:11-17, 281:25, 282:1-6, 302:3, 303:8-9, 312:9, 314:19-20, 315:3-4, 13-14, 25, 318:4, 319:21-22, 322:10, 338:7-11, 18, 25, 339:1-2, 10-12, 344:20-21, 358:8-10, 360:16, 369:7-8, 22-23, 550:13, 561:9-10, 15-16, 563:24-25, 583:10, 584:18, 23, 586:24, 587:8, 588:22-23, 589:1, 604:17-21, 605:7-10, 23, 606:14-15, 18, 610:1, 660:16-19, 663:9-10, 14-17, 20-24, 664:11, 19-20, 23-25, 665:1-2, 5, 19, 666:11, 17, 21, 667:2-3, 10-11, 673:5-6, 685:11-14, 688:11-12, 15, 18, 709:11-12, 711:11, 16-18, 712:2-3, 5-6, 8, 12, 896:2-4, 6-11, 13, 914:10-15, 1000:7-8, 10-11, 14, 1040:3, 8-10, 12-13, 16-18, 20, 1041:2, 6, 16, 18-21, 24-25, 1042:1, 3, 7-8, 10, 12, 17, 21-24, 1081:1-4, 6-7, 11, 14-15, 21-23, 1086:4, 7-9, 13-14, 18, 23-25, 1148:7, 1190:13, 18, 1191:1, 21-22, 25, 1192:1, 6, 10, 15-16, 20, 1193:3, 5, 10, 19.
					Limited portions that reveal confidential information regarding Facebook's privacy and platform policy enforcement practices. <i>Id.</i> at 76:4–7, 78:5–7, 10–12, 14–15, 17–19, 22, 79:1, 3, 80:12–13, 81:20–21, 24–25, 82:1, 116:18, 117:4–6, 10–12, 20, 24–25, 120:18, 226:11–12, 296:13–14, 19, 297:2, 12, 573:9–10, 12, 14–16, 576:18–19, 21, 579:17–18, 608:19–20, 609:18, 25, 611:1–3, 6–8, 10, 12–15, 19–20, 25, 612:1, 616:18–19, 21–22, 617:9–10, 15–20, 618:3, 619:6–7, 12, 14, 620:20, 621:3–4, 7–9, 11–13, 18, 622:11–15, 623:11–13, 20–22, 629:13, 15, 637:14–16, 21–25, 638:4–5, 7–8, 10–11, 639:22–23, 640:2–4, 7–8, 642:15–17, 21–23, 643:5–7, 10, 12–13, 644:2, 11–12, 645:4–5, 14–15, 17, 646:16–18, 648:4–5, 16–17, 649:13–14, 25, 650:1–3, 8–9, 19–22, 654:10–11, 23–24, 656:10–11, 19–21, 657:3–4,

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
					$\begin{array}{l} 658:17-18, 798:15-17, 19-21, 801:7-13, 15, 18-20, 21-22, 24-25, \\ 802:1-2, 5-9, 13-16, 18, 24-25, 803:1-2, 5-6, 8-9, 13-16, 19, \\ 804:1-5, 8-10, 14-15, 19, 22-25, 805:2-4, 6-14, 18, 23, 806:1-3, \\ 18-20, 807:6-7, 11-12, 23, 808:2-3, 11, 14-16, 20-21, 809:6-10, \\ 17-20, 811:5-8, 11-12, 14-15, 812:1-4, 7, 15-21, 23, 25, 813:1-3, \\ 5-8, 10-11, 14, 23, 814:2-3, 10-12, 15-17, 815:18-21, 25, 816:1-5, \\ 9-12, 20-23, 817:2-3, 8-9, 14-15, 19-20, 819:4-5, 9-10, 14, 820:4-6, 16-19, 823:1-4, 7-8, 15-23, 25, 824:1-2, 15-16, 825:9-11, 16-17, 24-25, 826:1, 4-7, 827:3-4, 9-12, 19-20, 22, 828:17-19, 829:6, 22-25, 830:24-25, 831:10-11, 13, 20-22, 832:9-10, 14-16, 18-20, 836:9, 22-24, 837:4-8, 23-25, 838:1-4, 13-14, 22-25, 839:1, 4-8, 843:20-22, 844:11-12, 926:3-4, 6-7, 10-20, 24-25, 962:1, 7-8, 978:4, 19-20, 23-24, 1001:8, 12, 16, 1002:16-17, 22-23, 25, 1003:1-5, 10-15, 17-19, 21, 24, 1004:1-2, 5, 1005:1-5, 7, 9-12, 14-19, 1022:2, 5-6, 8, 10, 14, 18-19, 21, 23, 1023:1-2, 4-5, 7, 11-12, 14, 16, 18, 19, 24-25, 1024:3, 8-9, 12-14, 18-19, 21-22, 25, 1025:1, 3, 6, 10, 12, 15, 19, 23, 1066:4-6, 10, 22-25, 1067:2-4, 6-7, 9, 12, 16-19, 1068:1, 3-4, 6, 8-9, 11-12, 15-16, 18-23, 1069:1, 4, 6-8, 10, 13-15, 17, 19-21, 23-25, 1070:3, 5, 8, 22, 1071:13-14, 16-17, 19, 21-24, 1072:1-2, 5, 10, 20, 1073:5, 9, 13-16, 19, 1074:3-4, 6, 12, 15-16, 18-21, 23, 1075:4-5, 8-9, 11, 18, 1076:2, 8-9, 12-15, 18, 20-21, 23-24, 1082:8, 11-13, 15-16, 20-21, 23-25, 1083:2, 4-5, 8, 12-14, 22, 25, 1084:1-3, 9-11, 16-18, 20, 23, 25, 1085:1-6, 9-11, 21, 1117:4-10, 1118:9-11, 19-20, 1121:6-7, 1131:9-10, 18-19, 22-23, 1137:1-3, 1155:19-20, 1167:23-25, 1168:1, 4-6, 20-23, 1196:22-23, 1197:9-10.                                    $

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
Facebook	Plaintiffs' Exhibit 106 (Chang Dep. Tr.)	Dkt. 1001	Dkts. 1038, 1046	Dkts. 1038-9, 1038-17	Limited portions that reveal confidential and competitively sensitive information regarding Facebook's business programs, strategies, decisions, and partners. Ex. 106 at 6:15–16, 6:18, 6:21–22, 7:8–9, 7:12, 7:14–15, 7:21–22, 7:24–25, 8:8–9, 8:12–13, 8:16–17, 8:23, 9:5–7, 22:6, 23:3, 23:6, 23:8–18, 24:12–15, 25:15–23, 29:21–30:2, 39:8–11, 41:5, 41:7, 41:11–12, 41:17–25, 42:4–11, 42:20, 42:22–24, 43:3–5, 43:9–11, 43:14–15, 43:17–19, 43:21–23, 43:25–44:2, 44:4–5, 44:8–10, 45:23–46:8, 46:10–12, 50:10–14, 51:9–23, 52:16–21, 54:12–16, 55:21–23, 59:22–23, 60:3–5, 60:7, 60:9–10, 60:12, 60:14–16, 60:18–19, 60:21–22, 60:23–61:6, 61:8–9, 73:3–4, 73:6, 73:8–13, 73:16–17, 73:20, 73:24, 74:6–9, 74:12–13, 74:17–20, 74:22–75:1, 75:3, 75:12–22, 76:4–5, 76:17–18, 76:21, 77:3–4, 77:6–8, 77:17–20, 77:24–25, 78:5–6, 78:11–23, 79:1, 79:3–9, 79:14–15, 79:20–22, 79:24–80:1, 80:5, 80:11–13, 80:16, 80:21–22, 81:3–5, 81:21, 81:24–82:3, 82:9–14, 82:18, 82:21–22, 82:24–83:3, 83:9–11, 83:14–17, 84:1–2, 84:4–10, 84:20, 84:24–24, 85:2–11, 85:13–19, 85:24–25, 88:4, 88:6, 88:10, 89:11, 89:14, 89:20, 89:22, 90:1–6, 90:10–19, 90:23, 91:2, 91:4–10, 91:14–17, 91:2192:4, 92:7–12, 92:16–17, 92:20, 92:22–23, 92:25, 93:2–6, 93:13–23, 94:1–9, 94:13, 94:17–22, 94:24–95:2, 95:6–7, 95:13–14, 95:18–96:7, 96:11–12, 96:15–16, 96:18–21, 97:1, 97:4–5, 98:4–5, 98:7–8, 98:11–14, 98:16, 99:23–100:3, 100:5–6, 100:8, 100:14–17, 100:19–21, 100:24–25, 101:7–9, 101:15–17, 101:24, 102:1–4, 102:8–10, 102:14, 102:18, 102:12–25, 103:4–6, 103:11–13, 103:19, 103:21–22, 103:24–104:4, 104:25–105:7, 105:12–13, 105:17, 105:24–25, 106:7–8, 106:11–14, 106:21–25, 107:5–10, 107:14–15, 107:19–21, 110:2–4, 110:4, 110:6–11, 110:16–111:1, 111:3–4, 111:6–7, 111:10–11, 111:16–18, 111:20–21,

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
					111:23–25, 112:6–7, 112:10–11, 112:13–16, 112:21, 112:24–113:1,
					113:4–5, 113:10–11, 113:18–21, 113:24–25, 114:4–5, 114:8, 114:11–
					15, 114:23–24, 115:2–3, 115:6–7, 115:11–22, 116:18–19, 116:21–24,
					117:3–4, 117:14–17, 117:25–118:3, 118:8–11, 118:13–14, 118:17–
					19, 119:1–3, 119:18–20, 122:10–11, 122:23, 122:25–123:1, 123:14,
					123:17–19, 123:22, 123:14–124:1, 124:4–6, 124:10–15, 125:3–4,
					125:8–12, 125:20–22, 126:2–4, 126:6–10, 126:13, 126:15–16,
					126:18, 126:20–127:1, 127:7, 127:9–13, 127:16–22, 128:1–7, 128:6–
					7, 128:9, 128:11–12, 128:19, 129:3–4, 129:6–8, 140:4, 140:11–12,
					140:15, 140:17–19, 141:8–12, 141:17–21, 142:15–16, 142:22–143:5, 143:9, 143:12–13, 143:17, 143:23–24, 144:2, 144:6–9, 144:12–13,
					143:17, 143:12–13, 143:17, 143:23–24, 144:2, 144:0–9, 144:12–13, 144:17, 144:23–25, 145:18–20, 146:4–7, 146:10–11, 146:14–15,
					146:19–20, 147:2–3, 147:5–8, 147:11–18, 147:21–22, 148:2, 148:8–
					9, 148:15, 148:18, 149:10, 149:13, 149:19, 150:7, 151:12, 151:20,
					151:23, 151:25–152:1, 152:16–17, 152:21–153:1, 153:10–11,
					153:19–23, 154:1–15, 154:23–24, 155:2, 155:4–10, 155:19–22,
					155:25–156:5, 156:9–19, 156:22–24, 157:4, 157:7–8, 157:12–13,
					157:17–18, 159:5–6, 159:20, 159:24–25, 160:12–13, 161:1–5, 161:9–
					10, 161:12–13, 161:17, 161:20, 161:23–25, 162:3, 162:7–10, 162:14,
					162:21–22, 162:24–25, 163:2–4, 163:9–11, 163:13–15, 163:19,
					163:24–164:3, 164:6–8, 164:12–15, 164:17–18, 164:21–23, 165:1–3,
					165:8–10, 165:13–14, 167:12, 167:16–18, 167:20–21, 167:24–25,
					168:15–16, 168:18–19, 168:24–25, 169:6–7, 169:9, 169:14, 169:20–
					21, 169:23, 169:25–170:1, 170:3–5, 170:15–16, 171:6–7, 172:10–11,
					172:15, 172:20, 174:2–3, 174:6–7, 174:9–10, 175:1, 175:5–8,
					175:18–176:2, 176:5–6, 176:8–10, 176:12–13, 176:17–18, 176:21–
					22, 176:24–25, 177:2, 177:4–6, 177:8–11, 178:1–3, 178:6–8, 178:11–

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
					15, 178:18–23, 179:3, 179:5–8, 179:12, 179:19–25, 180:3–7, 180:25, 181:18–20, 181:23–24, 182:4–12, 182:14–15, 182:19–21, 182:24–25,
					183:6, 183:15–16, 183:24–25, 184:4–5, 184:9–10, 184:14–15,
					184:18–19, 184:23–185:12, 185:19, 185:21–22, 186:18–19, 186:21–
					187:6, 186:9–12, 187:15–18, 187:22–188:1, 188:7–10, 188:12,
					188:18–21, 189:3–5, 192:8–10, 192:12–14, 192:21–23, 193:5–12,
					193:14–17, 193:22–194:2, 194:4, 194:8–13, 195:7–8, 195:11–15,
					195:17–19, 196:4–5, 196:10–13, 196:16–19, 196:25–197:1, 197:3,
					197:6–8, 197:17–19, 197:21–198:3, 199:4–5, 199:9, 199:12–200:2, 200:4–5, 200:18, 200:25–201:3, 201:9–23, 201:25–202:4, 202:6–10,
					200:14–3, 200:18, 200:23–201:3, 201:9–23, 201:23–202:4, 202:0–10, 202:16–19, 202:21, 202:23–203:1, 203:3, 203:5–6, 203:8–9, 203:11–
					13, 203:17–204:2, 204:6–7, 204:9–10, 204:12–14, 204:18–22,
					204:24–25, 205:4–5, 205:7–8, 205:10–11, 205:13–14, 205:20–206:4,
					206:7–16, 206:23–24, 207:16, 207:20–22, 208:5, 208:7–11, 208:12–
					15, 208:18–20, 208:22–24, 209:5, 209:8–17, 210:1–8, 210:13–15,
					210:17–211:6, 211:8–14, 211:18–212:1, 212:4–5, 212:8, 212:16–19,
					212:25–213:2, 213:5–8, 213:11–13, 213:18, 213:21, 213:24, 215:3–4,
					215:10–11, 215:14–16, 215:21–25, 216:2–3, 216:6, 216:10–11,
					216:13, 216:15–17, 217:10, 217:17–20, 217:22–25, 218:9–11,
					218:14–16, 219:7–9, 219:12, 219:17–18, 220:1–6, 220:10–12,
					220:16-19, 220:23-24, 221:12-13, 221:18-19, 221:21-25, 222:1-4,
					222:13–19, 222:22–24, 223:5–8, 223:10, 223:12, 223:14, 223:16, 223:18–19, 224:2, 224:4, 224:12–13, 224:15–22, 225:5, 225:12–13,
					225:17, 225:20–21, 226:4–7, 226:9, 226:11–12, 226:14, 226:24–
					227:1, 227:4–5, 227:8–16, 227:24–228:1, 228:14–20, 228:24, 229:2–
					6, 229:10, 229:12, 229:17–19, 230:15–16, 230:22–23, 230:25–231:1,
					231:5–10, 231:17–18, 231:21–22, 232:1–5, 232:11–17, 232:23,

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
					232:25, 233:9–12, 233:14–23, 233:25, 234:4, 234:11–15, 234:25–235:3, 235:21–24, 236:2–3, 236:16–17, 236:21, 237:1–2, 237:6, 237:8–9, 237:14, 237:16, 237:19, 237:24–238:2, 238:11–18, 238:24–239:1, 239:8–10, 239:12–15, 239:20–23, 240:3–6, 240:10–12, 245:10–12, 245:16–17, 245:23–24, 246:3, 246:12, 246:20–22, 247:7–8, 247:23, 249:3–6, 249:12, 249:16–17, 249:20–23, 250:1, 251:5–7, 251:9–18, 252:4–5, 252:18–25, 253:3–7, 253:9–10, 253:16, 253:24–25, 254:2–3, 254:6–8, 254:24, 255:2–8, 256:9–10, 257:6–7, 262:13–17, 262:22, 263:3–4, 269:16–19, 269:22, 271:23–25, 273:7–8, 273:14, 273:17–19, 273:22, 283:12–14, 283:16, 283:18, 284:1, 289:21–22, 290:3–4, 290:9–11, 290:13–15, 290:20–21, 295:7–8, 295:10–17, 295:19–20, 296:4–6, 296:8–9, 296:21–22, 297:12, 298:20–24, 299:1–7, 299:9–11, 299:19, 300:1–4, 300:7–10, 300:13–14, 300:17–22, 301:4–6, 301:10–12, 301:15–17, 301:21–23, 302:2–4, 302:18–20, 303:1–2, 303:8–10, 303:24, 304:1, 304:9–12.  Limited portions that reveal confidential information regarding Facebook's privacy and platform policy enforcement practices. <i>Id.</i> at 274:2–18, 275:4–5, 275:12–15, 275:19–20, 275:24, 276:1–6, 276:8–14, 276:16, 176:18–19, 277:1–2, 277:4–7, 278:2–4, 278:17–18, 279:8–10, 279:17–19, 280:1–7, 285:3–5, 285:9–20, 285:22, 286:4–6, 287:22–25, 288:17–25, 288:2, 288:12.
Facebook	Plaintiffs' Exhibit 116 (Lee Dep. Tr.)	Dkt. 1001	Dkts. 1038, 1046	Dkts. 1038-10, 1038-18	Limited portions that reveal confidential and competitively sensitive information regarding Facebook's business programs, strategies, decisions, and partners. Ex. 116 at 27:3, 27:5–10, 27:13–15, 27:16, 27:18–19, 27:24–25, 28:2–3, 28:5–7, 28:8–11, 28:20–22, 28:24–29:7,

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
					29:9, 29:13–14, 29:20, 30:6–7, 30:10, 30:25, 31:1, 31:6–8, 31:10–11, 31:14, 31:18, 31:20–24, 32:6–7, 32:8, 32:13–15, 33:1–4, 33:6, 33:12, 33:14, 33:18, 34:13–14, 34:18–19, 34:21, 34:22–23, 61:19–21, 62:1, 62:12, 63:8, 64:7, 64:13, 64:18, 64:21, 64:23–25, 65:5–7, 65:8–10, 65:16, 65:22, 66:6–7, 66:9, 66:19–20, 66:22–24, 67:5, 80:22, 81:3, 81:19, 98:6–9, 98:11–17, 114:2–8, 114:12, 120:22, 120:25, 121:2, 121:9, 121:17, 121:23, 121:25, 122:3, 122:5, 122:17, 123:1, 123:6, 123:7, 123:16, 123:18, 124:21, 124:22, 125:17, 125:20, 126:4, 126:11, 126:19, 131:11, 131:19–20, 135:25, 136:2, 136:3, 136:5–6, 136:7, 136:10, 136:13–17, 136:20, 136:23, 136:25–137:1, 137:9, 137:11, 137:16–17, 137:19, 147:11–13, 147:15–148:7, 161:2, 161:7, 164:24–25, 165:4–5, 165:8–9, 165:12–13, 167:5–8, 168:23–169:1, 169:5, 169:10, 169:16–19, 169:25, 170:1, 170:9, 170:12–14, 170:19–24, 171:1, 171:2, 171:4–21, 171:23, 172:3–12.
Facebook	Plaintiffs' Exhibit 140	Dkt. 1007	Dkt. 1041	Dkts. 1041-3, 1042-1	Limited portions that reveal confidential information regarding Facebook's employees. Ex. 140 at 6.
Facebook	Plaintiffs' Exhibit 141	Dkt. 1007	Dkt. 1041	Dkts. 1041-4, 1042-2	Limited portions that reveal confidential and competitively sensitive information regarding Facebook's business programs, strategies, decisions, and partners. Ex. 141 at 6.
Facebook	Plaintiffs' Exhibit 142	Dkt. 1007	Dkt. 1041	Dkts. 1041-5, 1042-3	Limited portions that reveal confidential information regarding Facebook's employees. Ex. 142 at 1.

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
Facebook	Special Master's August 19, 2022 Order Regarding Plaintiffs' Request for Leave to Move for Reconsideration of Order Re: Motion to Compel Production of Documents Related to Protiviti Assessment and the Exhibits thereto	Dkts. 1010, 1036	N/A	Dkts. 1036-3, 1036-4	Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Ex. C to Special Master's Order at 1–2.  Limited portions that reveal confidential information regarding Facebook's privacy and platform policy enforcement practices. <i>Id</i> .
Facebook	Richardson Declaration ISO Facebook, Inc.,	Dkt. 1016 <sup>5</sup>	N/A	Dkts. 1016-4, 1017-2	Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Decl. at ¶¶ 6–11.

\_

<sup>&</sup>lt;sup>5</sup> This Court's order, Dkt. 1048, mooted Facebook's sealing request for limited portions of Facebook, Inc., Gibson, Dunn & Crutcher LLP, and Orin Snyder's Supplemental Brief in Opposition to Plaintiffs' Motion for Sanctions. *See* Dkt. 1052.

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
	Gibson, Dunn & Crutcher LLP, and Orin Snyder's Supplemental Brief in Opposition to Plaintiffs' Motion for Sanctions				
Facebook	Exhibit 53 to the Richardson Declaration ISO Facebook, Inc., Gibson, Dunn & Crutcher LLP, and Orin Snyder's Supplemental Brief in Opposition to Plaintiffs' Motion for Sanction	Dkt. 1016	N/A	Dkts. 1016-5, 1017-3	Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Ex. 53 at 1–2, 4–5, 7–11.  Limited portions that reveal confidential information regarding ADI; the Court previously found good cause to seal similar information.  Id. at 1–2, 4–5. See Dkt. 838.

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
	("Defendant's Supplemental Exhibit")				
Facebook	Defendant's Supplemental Exhibit 56	Dkt. 1016	N/A	Dkts. 1016-6, 1017-4	Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Ex. 56 at 95:2–8, 10–11, 19, 21–22, 24, 96:5, 7, 19, 22, 24, 97:1, 22–23, 104:4–8, 12, 185:1–7, 9–10, 12–14, 16, 18, 22–24, 198:6, 10, 15.
					Limited portions that reveal confidential and competitively sensitive information regarding Facebook's business programs, strategies, decisions, and partners. <i>Id.</i>
Facebook	Defendant's Supplemental Exhibit 61	Dkt. 1016	N/A	Dkts. 1016-7, 1017-5	Limited portions that reveal confidential information regarding ADI; the Court previously found good cause to seal similar information. Ex. 61 at 2. <i>See</i> Dkt. 838.
Facebook	Defendant's Supplemental Exhibit 63	Dkt. 1016	N/A	Dkts. 1016-8, 1017-6	Limited portions that reveal confidential and competitively sensitive information regarding Facebook's business programs, strategies, decisions, and partners. Ex. 63 at 3–4.
Facebook	Defendant's Supplemental Exhibit 64	Dkt. 1016	N/A	Dkts. 1016-9, 1017-7	Limited portions that reveal confidential and competitively sensitive information regarding Facebook's business programs, strategies, decisions, and partners. Ex. 64 at 2–4.
Facebook	Defendant's Supplemental Exhibit 66	Dkt. 1016	N/A	Dkts. 1016-10, 1017-8	Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Ex. 66 at 1–5.

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
Facebook	Defendant's Supplemental Exhibit 68	Dkt. 1016	N/A	Dkts. 1016-11, 1017-9	Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Ex. 68 at 1.
Facebook	Defendant's Supplemental Exhibit 69	Dkt. 1016	N/A	Dkts. 1016-12, 1017-10	Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Ex. 69 at 19:15, 20:2.
Facebook	Defendant's Supplemental Exhibit 70	Dkt. 1016	N/A	Dkts. 1016-13, 1017-11	Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Ex. 70 at 2–7.
Facebook	Defendant's Supplemental Exhibit 73	Dkt. 1016	N/A	Dkts. 1016-14, 1017-12	Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Ex. 73 at 1–4.  Limited portions that reveal confidential information regarding
					Facebook's tool for responding to law–enforcement requests for user records. <i>Id.</i> at 2–3.
Facebook	Defendant's Supplemental Exhibit 82	Dkt. 1016	N/A	Dkts. 1016-15, 1017-13	Limited portions that reveal confidential and competitively sensitive information regarding Facebook's business programs, strategies, decisions, and partners. Ex. 82 at 269:2–6.
Facebook	Exhibit C to Special Master's	Dkt. 1026 <sup>6</sup>	Dkt. 1044	Dkts. 1044-3, 1044-4	Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Ex. 1 at 6.

<sup>-</sup>

<sup>&</sup>lt;sup>6</sup> Plaintiffs filed under seal the Special Master's Amended Order on Plaintiffs' Motion for Additional Time to Conduct Rule 30(b)(6) Depositions (Dkt. 1026-3), the Special Master's Order on Plaintiffs' Motion for Permission to Serve 30(b)(6) Notice on Facebook

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
	Amended Order on Plaintiffs' Motion for Additional Time to Conduct Rule 30(b)(6) Depositions				Limited portions that reveal confidential information regarding Facebook's privacy and platform policy enforcement practices. <i>Id.</i> at 7.
Facebook	Exhibit A to Special Master's Second Amended Order on Plaintiffs' Motion to Compel Additional	Dkt. 1030	Dkt. 1044	Dkts. 1044-5, 1044-6	Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Ex. 3 at 4, 5.  Limited portions that reveal confidential information regarding Facebook's privacy and platform policy enforcement practices. <i>Id.</i> at 4.

Regarding FTC Complaints and Consent Orders (Dkt. 1028-3), the Special Master's Second Amended Order on Plaintiffs' Motion to Compel Additional Production of Quips, Tasks, and Groups (Dkt. 1030-3), the Special Master's Order Regarding Facebook's Objections to 30(b)(6) Written Questions (Dkt. 1032-3), and all exhibits attached to the four orders. In its initial and supplemental Statements ISO Plaintiffs' Motion to Seal, however, Facebook did not seek to permanently seal any portion of the Special Master's Amended Order on Plaintiffs' Motion for Additional Time to Conduct Rule 30(b)(6) Depositions, or Exhibits A, B, D, or E thereto, the Special Master's Order on Plaintiffs' Motion for Permission to Serve 30(b)(6) Notice on Facebook Regarding FTC Complaints and Consent Orders, or any of the exhibits thereto, or the Special Master's Second Amended Order on Plaintiffs' Motion to Compel Additional Production of Quips, Tasks, and Groups, or Exhibits C, D, E, F, H, or I thereto. See Dkts. 1043, 1044.

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
	Production of Quips, Tasks, and Groups				
Facebook	Exhibit B to Special Master's Second Amended Order on Plaintiffs' Motion to Compel Additional Production of Quips, Tasks, and Groups	Dkt. 1030	Dkt. 1044	Dkts. 1044-7, 1044-8	Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Ex. 5 at 2, 7, 9, 11, 17.  Mediation discussions containing confidential and competitively sensitive information. <i>Id.</i> at 20, 22.
Facebook	Exhibit G to Special Master's Second Amended Order on Plaintiffs' Motion to Compel Additional Production of	Dkt. 1030	Dkt. 1044	Dkts. 1044-9, 1044-10	Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Ex. 7 at i, 12–14, 20.  Limited portions that reveal confidential information regarding Facebook's tool for responding to law–enforcement requests for user records. <i>Id.</i> at i, 14–17.  Limited portions that reveal confidential information regarding ADI; the Court previously found good cause to seal similar information. <i>Id.</i> at 9–10, 31. <i>See</i> Dkt. 838.

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
	Quips, Tasks, and Groups				Limited portions that reveal confidential and competitively sensitive information regarding Facebook's business programs, strategies, decisions, and partners. <i>Id.</i> at 24, 31–32.
Facebook	Special Master's Order Regarding Facebook's Objections to 30(b)(6) Written Questions	Dkt. 1032	Dkt. 1043	Dkts. 1043-3, 1043-4	Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Ex. 1 at 5.  Limited portions that reveal confidential information regarding Facebook's privacy and platform policy enforcement practices. <i>Id.</i> at 6.
Facebook	Exhibit A to Special Master's Order Regarding Facebook's Objections to 30(b)(6) Written Questions	Dkt. 1032	Dkt. 1044	Dkts. 1044-11, 1044-12	Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Ex. 9 at 23–25, 26–41, 60, 75–76.  Limited portions that reveal confidential information regarding Facebook's privacy and platform policy enforcement practices. <i>Id.</i> at 23, 38–41.  Limited portions that reveal confidential and competitively sensitive information regarding Facebook's business programs, strategies, decisions, and partners. <i>Id.</i> at 43–53.
Facebook	Exhibit B to Special Master's Order Regarding Facebook's	Dkt. 1032	Dkt. 1044	Dkts. 1044-13, 1044-14	Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Ex. 11 at 6, 10–17, 24–39, 58.

Party Requesting Sealing	Document Title/ Description	ECF No. for Motion to Seal	ECF No. for Statement ISO Sealing	ECF No. for Redacted and Sealed Copies	Portions of Document Sought to Be Sealed and Basis for Sealing
	Objections to 30(b)(6) Written				Limited portions that reveal confidential information regarding Facebook's privacy and platform policy enforcement practices. <i>Id.</i> at 6, 20, 24, 36–39.
	Questions				Limited portions that reveal confidential and competitively sensitive information regarding Facebook's business programs, strategies, decisions, and partners. <i>Id.</i> at 18–19, 41–51, 57.
Facebook	Miller Dep. Tr.	Dkts. 1067, 1070	Dkt. 1074	Dkts. 1074-1, 1074-2	Limited portions that reveal confidential information regarding Facebook's proprietary video technology, data systems, and data storage and processing practices. Miller Dep. Tr. at 115:1–116:9, 116:19–117:7, 117:9–22.
Facebook	Fahey Dep. Tr.	Dkts. 1067, 1070	Dkt. 1074	Dkts. 1074-3, 1074-4	Limited portions that reveal confidential information regarding Facebook's proprietary video technology, data systems, and data storage and processing practices. Fahey Dep. Tr. at 28:25–30:1, 82:9–13, 16–21.

Dated: November 16, 2022

## KELLER ROHRBACK L.L.P.

By: /s/Derek W. Loeser
Derek W. Loeser

Derek W. Loeser (admitted *pro hac vice*)
Lynn Lincoln Sarko (admitted *pro hac vice*)
Gretchen Freeman Cappio (admitted *pro hac vice*)
Cari Campen Laufenberg (admitted *pro hac vice*)
David J. Ko (admitted *pro hac vice*)
Benjamin Gould (SBN 250630)
Adele Daniel (admitted *pro hac vice*)
1201 Third Avenue, Suite 3200
Seattle, WA 98101
Tel. (206) 623, 1000

Tel.: (206) 623-1900
Fax: (206) 623-3384
dloeser@kellerrohrback.com
lsarko@kellerrohrback.com
gcappio@kellerrohrback.com
claufenberg@kellerrohrback.com
dko@kellerrohrback.com
bgould@kellerrohrback.com
adaniel@kellerrohrback.com

Christopher Springer (SBN 291180) 801 Garden Street, Suite 301 Santa Barbara, CA 93101 Tel.: (805) 456-1496 Fax: (805) 456-1497 cspringer@kellerrohrback.com

Plaintiffs' Co-Lead Counsel

## GIBSON, DUNN, & CRUTCHER LLP

By: /s/Deborah Stein
Orin Snyder (pro hac vice)
osnyder@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
200 Park Avenue
New York, NY 10166-0193
Telephone: 212.351.4000

Respectfully submitted,

aornelas@bfalaw.com

## BLEICHMAR FONTI & AULD LLP

By: <u>/s/Lesley E. Weaver</u> Lesley E. Weaver

Lesley E. Weaver (SBN 191305)
Anne K. Davis (SBN 267909)
Joshua D. Samra (SBN 313050)
Matthew P. Montgomery (SBN 180196)
Angelica M. Ornelas (SBN 285929)
555 12th Street, Suite 1600
Oakland, CA 94607
Tel.: (415) 445-4003
Fax: (415) 445-4020
lweaver@bfalaw.com
adavis@bfalaw.com
jsamra@bfalaw.com
mmontgomery@bfalaw.com

45

Facsimile: 212.351.4035

Deborah Stein (SBN 224570) dstein@gibsondunn.com Heather Richardson hrichardson@gibsondunn.com 333 South Grand Avenue Los Angeles, CA 90071-3197 Telephone: 213.229.7000

Facsimile: 213.229.7000

Joshua S. Lipshutz (SBN 242557) jlipshutz@gibsondunn.com GIBSON, DUNN & CRUTCHER LLP 1050 Connecticut Avenue, N.W. Washington, DC 20036-5306 Telephone: 202.955.8500 Facsimile: 202.467.0539

Rosemarie T. Ring (SBN 220769) rring@gibsondunn.com Kristin A. Linsley (SBN 154148) klinsley@gibsondunn.com Martie Kutscher (SBN 302650) mkutscherclark@gibsondunn.com 555 Mission Street, Suite 3000 San Francisco, CA 94105-0921

Telephone: 415.393.8200 Facsimile: 415.393.8306

Attorneys for Defendant Facebook, Inc.